

**COUNTY OF PLACER
FACILITY SERVICES DEPARTMENT**

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August 22, 2008

California Regional Water Quality Control Board
Central Valley Region
Attn: Robin Merod
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

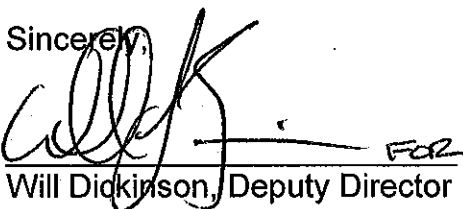
**Re: Comments on Tentative Waste Discharge Requirements Amendment for
the Placer County Service Area 28, Zone 6 Sheridan Wastewater
Treatment Plant**

Dear Mr. Merod:

The Placer County Department of Facility Services (County) appreciates the time that Central Valley Regional Water Quality Control Board (CVRWQCB) staff has spent with the County to discuss the Tentative Amendment for the Sheridan Wastewater Treatment Plant. As discussed in the August 13, 2008 meeting between County staff and CVRWQCB staff, the County supports the rescission of the NPDES portion of the existing permit and leaving the remaining land discharge requirements unchanged.

Please find enclosed the County's comments on the Tentative Amendment. If you have any questions, please contact Kevin Bell at (530) 886-4915.

Sincerely,



Will Dickinson, Deputy Director

WD:KB:lm

cc: Gina Kathuria, CVRWQCB
Diana Messina, CVRWQCB
Dave Kim, CVRWQCB
Mary Serra, CVRWQCB
Mike Bryan, Robertson – Bryan, Inc.
Roberta Larson, Somach, Simmons and Dunn

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11476 C Avenue Auburn CA 95603
Entrance at 2855 2nd Street

Administration – Building Maintenance – Capital Improvements – Museums – Parks
Property Management – Environmental Engineering – Utilities

PLACER COUNTY COMMENTS
ON
TENTATIVE AMENDMENT
FOR WDR R5-2002-0208
PLACER COUNTY SERVICE AREA 28, ZONE 6
SHERIDAN WASTEWATER TREATMENT PLANT
PLACER COUNTY

AUGUST 22, 2008

I. GENERAL COMMENTS:

Background

Placer County is in the process of converting the County Service Area 28, Zone 6 Sheridan Wastewater Treatment Plant (WWTP) from a combination land disposal and surface water discharge WWTP to a full land disposal WWTP without surface water discharge. This conversion is in response to a CDO issued by the Central Valley Regional Water Quality Control Board (CVRWQCB) in 2002. The necessary improvements are being completed in phases. Many improvements are already complete and the County is on schedule to complete the remaining improvements by July 2009. In 2006, the County constructed a new lined seasonal storage reservoir that provided sufficient storage to contain the 100 year seasonal inflow. In accordance with the CDO, no effluent has been discharged from the Sheridan WWTP to surface waters since 2006. In 2008, the County completed temporary improvements on an additional 7.4 acres of leased spray irrigation area. Both the storage pond and the expanded spray irrigation area are in use at this time. The final steps to finish the conversion to a full land disposal WWTP are to convert one of the existing ponds to a seasonal storage reservoir, expand the disposal areas and minor mechanical modifications to the existing WWTP.

As a result of the cessation of surface water discharge, the CVRWQCB planned to rescind the NPDES portion of the existing permit by amending the existing permit. On July 22, 2008 the County received the Tentative Resolution amending WDR Order R5-2002-0208 and rescinding NPDES Permit CA0079341 and CDO R5-2002-0209 (Tentative Amendment) for the Sheridan WWTP. The Tentative Resolution also included new discharge limitations, an adjusted ADWF capacity and a significant increase in monitoring and reporting requirements. In addition, it is the County's understanding that the Tentative Resolution is intended to be temporary and a new land disposal permit would be issued when the final improvements are complete. The County is concerned with the additional time and resources required to go through the permitting twice in short period of time as well as the issue of receiving a permit with a much lower permitted capacity that does not reflect the improvements in progress. Then to have to go back and try to get the permitted capacity increased once the improvements are complete. As a result, the County requested a meeting with CVRWQCB staff to discuss these concerns. Placer County staff met in person with Ken Landau, Gina Kathuria, Robin Merod and Mary Serra (via telephone) on August 13, 2008 regarding the County concerns.

At that meeting, Ken Landau proposed that the NPDES portion of the permit be rescinded thereby prohibiting any discharge to surface waters, and proposed that the rest of the land discharge WDRs not change from the existing permit. Due to the current transitional nature of the WWTP, it was agreed that it would be most practical and efficient, for both County and CVRWQB staff, to only rescind the NPDES portion of the existing permit at this time, and to leave the remainder of the land disposal WDRs unchanged. Placer County supports this decision and the rescission of the NPDES portion of the permit. In addition, the County would like to note that CVRWQCB staff have been very cooperative and professional throughout this process and should be credited with providing a win win solution that works for everyone.

Although the current plan will leave the existing land disposal WDRs unchanged at this time, the County is in the process of completing a geotechnical investigation, a Title 22 Engineering Report and a revised water balance to reflect the improvements that will transition the Sheridan WWTP from a land disposal/surface water discharge facility to a full land disposal facility. Upon the completion of these documents we will provide CVRWQCB staff with the necessary information to prepare new land disposal WDRs.

Although County and CVRWQCB staff have agreed on an approach that will allow us to move forward without changes to the currently permitted land disposal requirements, the County feels is appropriate and necessary to provide our comments on the Tentative Amendment.

II. SPECIFIC COMMENTS:

p. 1, item #5. As stated above, the Sheridan WWTP is in a transitional period and the County needs additional time to evaluate the ultimate capacity of the facility. The Tentative Amendment currently indicates the WWTP ADWF capacity is 40,000 gpd based on the water balance included in the original Report of Waste Discharge. This water balance was based on old flow data prior to significant I/I reduction improvements in the collection system and is not representative of the current collection system condition. In addition, the water balance did not include all of the planned improvements that are currently in progress and it was based on a single 100 year season. The water balance will be modified to include new representative data, all new improvements and will consider a two year term for the water balance, a 100 year season followed by an average season. This evaluation will be conducted along with the preparation of the Title 22 Engineering Report and the geotechnical investigation and report.

Effluent Limitations

p. 3, item 4.1. States that the BOD₅ and Total Dissolved Solids (TDS) limits are effective immediately. As these are new, more stringent limitations, the County is entitled to compliance schedules and interim limitations if the WWTP cannot immediately comply with them.

Regarding the BOD₅ limitation, the County requests additional time to evaluate if the WWTP can reliably meet the effluent limitation of 45 mg/L. The previous permit included a limitation of 45 mg/L for Title 22 reuse, but did not impose a BOD₅ limitation for land disposal without reuse. The planned mechanical improvements will be designed to comply with a BOD₅ effluent limitation of 45 mg/L.

Regarding the TDS limitation, the County was not previously required to monitor TDS on a regular basis and requests time to collect more data to determine if compliance can be achieved.

For the reasons stated above, the County requests compliance schedules based upon an accepted infeasibility analysis.

p. 3, item 4.1. States that "the effluent discharged from the treatment pond into Seasonal Reservoir 1 or 2 shall not exceed..." The County proposes the following change "the effluent discharged from the chlorine contact pipe into Seasonal Storage Reservoir shall not exceed..."

p. 3, item 4.2. States that "Effluent discharged from either Seasonal Storage Reservoir 1 or 2 shall not exceed..." The County proposes the following change "Effluent discharged from the chlorine contact pipe shall not exceed..." This is consistent with the compliance point for other constituents and with the Effluent Monitoring section of the Monitoring and Reporting Program. In addition, the storage ponds are open to birds, frogs and other wildlife that can introduce coliform into the ponds making compliance difficult, if not impossible.

In addition, the Tentative Amendment proposes 23/240 MPN/100 ml coliform bacteria limitations. Title 22 (Purple Book) states: "(d) Recycled wastewater used for the surface irrigation of the following shall be at least undisinfected secondary recycled water:

(1) Orchards where the recycled water does not come into contact with the edible portion of the crop,.....

(4) Fodder and fiber crops and pasture for animals not producing milk for human consumption,"

Based on the County's potential reuse for fodder crop and pasture for animals not producing milk for human consumption and the Purple Book guidance that this use only requires undisinfected secondary treatment, the County requests the removal of the 23/240 MPN/100 ml coliform bacteria limitations.

If the total coliform limitations remain, the County would need additional time to evaluate if the current disinfection facilities can provide sufficient disinfection and construct new facilities if necessary.

p. 3, item 4.3. States that the influent ADWF shall not exceed 40,000 gpd. As discussed above this number is based on an outdated and incomplete water balance and the WWTP capacity should remain at 60,000 gpd until the final improvements described above are completed and can be evaluated.

Groundwater Limitations

p. 4, item 8. States that the disposal cannot cause the groundwater pH to be less than 6.5 or greater than 8.4 pH units. The County believes this is a typo and should read less than 6.5 or greater than 8.5 pH units.

Provisions

p. 4, item 13. Requires the submission of an Operation and Maintenance Plan (O&M Plan) by January 9, 2009. The Tentative Amendment also lists the required sections and provides a very detailed description of what is required in each section. The County requests that the detailed description of what is required within each section be eliminated while leaving the section list in tact, as the Sheridan WWTP is a very small pond plant and the requirements are extensive and may not apply to this facility. Removing the detailed description would allow the County to produce a document that meets the needs of the facility and is tailored to include only the necessary information to operate and maintain this facility instead of a cumbersome document that is difficult to use.

The County requests additional time to complete the O&M Plan such that it can be prepared when the WWTP conversion is complete so that it incorporates all of the improvements.

Monitoring and Reporting Program

p. 5, last sentence. States that "This Order is effective as of the date of adoption." The County believes that the effective date of adopted orders is typically 60 days after the adoption date.

Monitoring and Reporting Program

The Tentative Amendment includes significantly more monitoring requirements than the previous permit. The Community of Sheridan is a very small impoverished community and any additional cost incurred at the WWTP is significant. The County requests that the monitoring requirements be re-evaluated, in light of the community, and reduced in both constituents and frequency of sampling to that which is absolutely necessary. The County requests reduced monitoring of specific constituents below.

Influent Monitoring

The County requests that monitoring for BOD₅ and TSS in the influent be eliminated because there is not a limitation associated with these constituents. If it is deemed necessary, the County requests that the frequency of monitoring be reduced from 5 days per week to 3 days per week. The County currently staffs the facility 3 days per week on average. Requiring sampling 5 days per week will significantly increase the operating cost of the WWTP.

Effluent Monitoring

The County requests that monitoring for residual chlorine, sodium, chloride, TKN, and trihalomethanes in the effluent be eliminated because there is not a limitation associated with these constituents.

If total residual chlorine is deemed necessary, the County requests that the frequency of monitoring be reduced from 5 days per week to 3 days per week. The County currently staffs the

facility 3 days per week on average. Requiring sampling 5 days per week will significantly increase the operating cost of the WWTP.

Land Application Area Monitoring

The County requests that flow monitoring for the land application area be reduced to a single flow meter on the discharge from each SSR instead of a flow meter for each land application area. This would still allow the County to monitor flow to the land application areas and determine water application rates without the additional cost to install and record and compile data from several additional meters.

Groundwater Monitoring

p. 4, Groundwater monitoring. The depth to groundwater should be measured to the nearest 0.1 ft, rather than 0.01 ft.

The County requests that monitoring for TKN, trihalomethanes, boron, and metals be eliminated because there is not a limitation associated with these constituents.